

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

GRAHAM CHASE ROBINSON,

Plaintiff and Counterclaim Defendant,

-against-

ROBERT DE NIRO,

Defendant,

and

CANAL PRODUCTIONS, INC.,

Defendant and Counterclaim Plaintiff.

Civil Action No. 1:19-CV-09156 (LJL) (KHP)

**SECOND AMENDED EXHIBITS TO BE OFFERED IN
DEFENDANTS' CASE IN CHIEF, INCLUDING
THE COUNTERCLAIMS OF CANAL PRODUCTIONS, INC.**

Defendants Robert De Niro and Canal Productions, Inc. (“Canal”) (collectively, “Defendants”) respectfully submit the following Exhibits to be Offered in Defendants’ Case in Chief, including Canal’s Counterclaims, to the Court pursuant to the Court’s Individual Rules and the Court’s Order (ECF No. 419). Defendants reserve the right to amend this list by adding, removing, providing clarifications regarding Bates-stamp designations, duplicative exhibits, redactions and/or excerpts from exhibit materials to be used, to otherwise modify any exhibits in light of those exhibits identified by Plaintiff and/or as a result of the Court’s evidentiary rulings or any other reasons. Defendants also reserve the right to introduce any exhibit identified by Plaintiff, and to introduce other exhibits for purposes of impeachment or rebuttal.

Dated: November 5, 2023

Respectfully Submitted,

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& SHREWSBERRY LLP**

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Robert De Niro*

Ds Ex. No.	Bates-Stamped No.	Description	Plaintiff's Objections
			* = No objections
			Motions in Limine Decision
001	ROBINSON00004592	Dec. 18, 2018 email exchange between Ms. Robinson and Mr. De Niro	403 (need to redact Trump reference)
002*	ROBINSON00013908-13909	April 8, 2011 email exchange between Ms. Robinson and Mr. Boswick	*
003*	ROBINSON00008002	Dec. 13, 2012 email exchange between Ms. Robinson and Mr. De Niro	*
004*	CANAL_0045910	July 18, 2017 email exchange between Ms. Robinson and Mr. De Niro	*
005*	CANAL_0019293	July 20, 2017 email exchange between Ms. Robinson, Mr. Boswick and Mr. Tasch	*
006*	ROBINSON00003284	Nov. 10, 2017 email exchange between Ms. Robinson and Mr. De Niro re Ms. Robinson's title change	*
007*	CANAL_0045968-45969	Dec. 24, 2017 email exchange between Ms. Robinson and Mr. De Niro re Title chance to Vice President of Production & Finance	*
008*	CANAL_0049267-0049271	June 4, 2019 email exchange between Ms. Robinson, Mr. Harvey and Mr. De Niro	*
009*	ROBINSON00005231	June 13, 2019 email exchange between Ms. Robinson and Marianna Shafran re Ms. Robinson Bio	*
010	CANAL_0001-0003	July 11, 2019 letter from Tom Harvey to Chase Robinson re abuse of Ms. Robsinson's use of SkyMiles	402, 802
010A	CANAL_0001-0003	July 11, 2019 letter from Tom Harvey to Chase Robinson re abuse of Ms. Robsinson's use of SkyMiles	*
011	ROBINSON00016395-16435	Ms. Robinson's medical record from Dr. Weiser-McCarthy for office visit of 12/21/21	
012	CANAL_0044293-0044294	Nov. 30, 2012 email exchange between Chase Robinson and Olivia Jampol	402, 403, 901
013*	ROBINSON00004504	Nov. 7, 2018 email exchange beween Chase Robinson and Andrea Robinson	*
014*	ROBINSON00002608	July 18, 2017 email exchange between Chase Robinson and Robert De Niro	*
015	ROBINSON00008381	July 20, 2017 email exchange between Ms. Robinson, Mr. Boswick and Mr. Tasch	402

016*	ROBINSON000007998, ROBINSON00008008, ROBINSON00008028, ROBINSON00008096, ROBINSON00008228, ROBINSON00014191, ROBINSON00009811-00009812, ROBINSON00008480-00008481, ROBINSON00008623-00008624, (Ex QQ from Pl. Depo, D2)	Compilation of year-end emails from Chase Robinson to M. Tasch	*
017*	ROBINSON00013838-13843	April 6, 2019 emails (3 in total) among T. Chen, S. Weeks-Brittan, R. De Niro, G. Spear and L. White	*
018*	ROBINSON00008921	Apr. 2, 2019 email exchanges between Chase Robinson and R. De Niro	*
019*	ROBINSON00004874	Apr. 10, 2019 email exchange between Chase Robinson and T. Harvey	*
020*	ROBINSON00001655	Apr. 9, 2019 email exchange between R. De Niro and Chase Robinson	*
021*	ROBINSON00001347-00001349	Mar. 27, 2019 email exchange between R. De Niro and Chase Robinson (including exchange between T. Chen, R. De Niro and Chase Robinson)	*
022*	ROBINSON00007976	Dec. 6, 2018 text message exchange between T. Chen and R. De Niro	*
023*	ROBINSON00001602	Apr. 4, 2019 email exchange between R. De Niro and Chase Robinson	*
024	ECF #295	Oct. 30, 2022 Declaration from R. De Niro in Supp. of Defs. SJ Mtn.	802
025*	CANAL_0021984-0021985 and CANAL_0002706	Letter of Conditional Offer of Employment dated Aug. 22, 2018, addressed to Louisa Sidney White	*
026*	CANAL_0052117	June 24, 2018 email exchange between H. Feder and Chase Robinson	*
027*	CANAL_0018093-0018094	Apr. 11, 2017 email exchanges between M. Tasch and Chase Robinson	*
028	CANAL_0018410	Apr. 25, 2017 email exchange between R. De Niro and Chase Robinson	402
029	CANAL_0020876-20877, 0002462, 0002465-0002466, 0022031-0022032, 0036675, 0002713, 0022104, 0002714-0002715, 0002467, 0048069-0048071, 0002717, 0002468, 0024482, 0022999, 0002718, 0027338-0027339 (Compilation of Emails from Defs. MSJ (Bennett Decl., Ex. 13)	Email and text exchanges regarding Chase Robinson, overtime and Canal office operations	402
030*	CANAL_0046031-0046032	Dec. 18 and 28, 2018 email exchanges between Chase Robinson and R. De Niro	*
031*	CANAL_0046038	Jan. 3, 2019 email from Chase Robinson to R. De Niro	*

032*	CANAL_0046210	Feb. 10, 2019 email exchange between T. Chen and R. De Niro	*
033*	CANAL_0009189-0009190	Feb. 13, 2019 email exchanges among T. Chen, Chase Robinson and R. De Niro	*
034*	CANAL_0023036	Mar. 8, 2019 email from Chase Robinson to R. Chambers including an exchange between Chase Robinson, T. Chen and R. De Niro	*
035*	CANAL_0044237-0044238	Mar. 8, 2019 email from Chase Robinson to T. Harvey and M. Tasch	*
036*	CANAL_0009191-0009193	Mar. 27, 2019 email exchange among T. Chen, M. Kaplan, Chase Robinson and R. De Niro	*
037*	CANAL_0034641-0034642	Apr. 2, 2019 email from R. De Niro to M. Kaplan, including exchange between T. Chen and R. De Niro	*
038*	ROBINSON00006433	Apr. 2, 2019 text exchange between Chase Robinson and John Humphries	*
039*	ROBINSON00008495	Feb. 22, 2018 email exchanges between Chaeas Robinson and R. De Niro regarding Spain	*
040	ROBINSON00006478-00006484	Apr. 4, 2019 text exchange between Chase Robinson and Rachel Humphries	802
041	CANAL_0049474-0049478	Apr. 4, 2019 text exchanges between T. Chen, G. Spear and S. Weeks-Brittan	802
042	ROBINSON00001637-00001638	Apr. 6, 2019 email exchange between Chase Robinson and R. De Niro	402
043	ROBINSON00013838-00013843	April 6, 2019 emails (3 in total) among T. Chen, S. Weeks-Brittan, R. De Niro, G. Spear and L. White	802, 402
044*	CANAL_0035499-0035500	April 6, 2019 email from Chase Robinson resigning to position and email threat between R. De. Niro and T. Chen re same	*
045*	ROBINSON_00001641-00001642	Apr. 6, 2019 email exchanges between Chase Robinson and R. De Niro (with T. Harvey, M. Boswick, M. Tasch and J. Hackett copied)	*
046*	CANAL_0046715	Apr. 8, 2019 email exchange between T. Chen, M. Tasch and R. D Niro	*
047*	ROBINSON00005129-00005131	May 16, 2019 email exchanges between Chase Robinson and T. Harvey	*
048*	CANAL_0049890	June 4 and 7, 2019 emails from Chase Robinson to R. De Niro	*

049	Canal State Court Complaint, dated August 17, 2019		802
050	Defs. 3d Am. Rog Resps., dated July 27, 2022 (ECF 289-26)		402, 802
051	ROBINSON00009964, ROBINSON00008625- 00008626, ROBINSON00009969, ROBINSON00009971-00009972, ROBINSON00008228, ROBINSON00008096	Annual emails regarding vacation usage between and among R. De Niro, M. Tasch and Chase Robinson	802 as to ROBINSON8096 only
052	Complaint in this action, dated Oct. 3, 2019		802
053	MSJ, Bennett Decl. ¶73 Only (ECF 289)		802, 402, 403
054	Defs. Resp. to Plaintiff's 1 st Set of Interrogatories		402, 802
055	Pl.'s Resp. to Defs. 1 st Set of Interrogatories		402, 802
056	Defendants' First Amended Answer with Canal's Counterclaims		402, 802
057	Pl.'s Answer to Canal's Counterclaims		402, 802
058	Bennett Decl., MSJ ¶74 Only (ECF #289)		802, 402, 403
059	Defs. Requests for Admission		402, 802
060	Email from Plaintiff's Counsel dated Dec. 24, 2021 with attachment	Inventory of items Chase Robinson returned to Defs. Counsel during discovery	402, 403
061	Email from Plaintiff's Counsel dated Aug. 5, 2022 with attachment (ECF 290-8)	Overlay of Audio Recording Metadata	802, 901
062	Canal's Declaration Re Certain 30(b)(6) Topics, dated Sept. 7, 2022		402, 802
063	Defs. Amended Initial Disclosures, dated Apr. 7, 2022		402, 802
064	Pl. Amended Initial Disclosures, dated Dec. 16, 2021		402, 802
065	Canal's Second Amended Statement of Damages and Computation, dated Aug. 16, 2022		402, 802
066*	CANAL_0021-0036	Canal Productions, Inc. Complaint Form, Non-Discrimination and Anti-Harassment Policy and Related Fact Sheets/Posters	*
067	CANAL_0053261-0053297	Tribeca Film Ctr. Employee Handbook	402
068	Defs. Supp. to Initial Disclosures, dated Dec. 12, 2022		402, 802
069	Pl. Amended Initial Disclosures, dated May 13, 2022		402, 802
070	Pl. Supp. Response to Defs. Interrogatories, dated Dec. 16, 2021		402, 802
071	Pl. Amended Initial Disclosures, dated June 21, 2023		402, 802
072	Pl.'s Am. Resp. to Canal's First Requests for Admission, dated Dec. 16, 2021		402, 802
073	Pl. First Privilege Log, dated Feb. 9, 2022		402, 802

074	Defs. Am. Resps. To Pl.'s First Set of Interrogatories, dated June 22, 2020		402, 802
075	ROBINSON00010661*	March 13, 2019 email exchange between Lulu White and Chase Robinson	
076*	Defs. Psych. Expert Report, dated May 13, 2022		*
077	ROBINSON00013219	Text exchange between M. Kaplan and Chase Robinson	402
078	ROBINSON00008491-00008492	Email exchange between Chase Robinson, R. De Niro and M. Tasch	402
079	All of Plaintiff's Medical Records Reviewed by Any of the Parties' Expert Witnesses	Audiotapes, Recorded by Ms. Robinson between March 17 – June 15, 2019, Bates-stamped ROBINSON_7158, 7195, 7199, 7187, 7161, 7186, 7174, 7209, 7226, 7224, 7175, 7168 and 7229 (recordings are provided below) and other records reviewed by any of the parties' expert witnesses.	Reserve right to object to specific documents
080	Compilation of Emails from Reply Brief, Beginning with Canal_0011975 (ECF 361-1 (37 pages))	Various email exchanges involving Chase Robinson using the term "the girls"	402
081A	Reply Brief, Beginning with Canal_0049276-0049285 (ECF 361-2)	Compilation of Emails involving M. Tasch and American Express personnel	802
081B*	ROBINSON00001821-00001822	Chase Robinson Timesheets	*
082	CANAL_0036513-0036515	April 12, 2019 email exchanges amongst numerous existing and former Canal personnel	802, 402, 403
083	Supp. Dec. of R. De Niro in Opposition to P's MSJ (ECF 351)	11.20.22 Supp. Dec. of RDN – (Unredacted)	802
084	ROBINSON00013163-00013178	Compilation of Delta Account Activity for Chase Robinson from Jan. 1, 2019-Nov. 6, 2019	802
085	ROBINSON00016440-00016457	American Express Membership Rewards Summary	802
086	CANAL_0052844-0052855	From Binder Compilation, Delta SkyMiles Usage	802, 901
087	CANAL_0036318-0036319	Mar. 8, 2018 Flower Purchase Confirmation	802, 402
088	CANAL_0036316-0036317	Mar. 12, 2019 Flower Purchase Confirmation	802, 402
089	CANAL_0036566-0036567	Mar. 10, 2017 Flower Purchase Confirmation	802, 402
090	CANAL_0052857-0052889	From Binder Compilation, Netflix Usage	802, 402, 403
091*	CANAL_0020878-0020882	March 2018 Email Exchanges Between Chase Robinson and Office of Joe Peschi	*
092*	CANAL_0052319, CANAL_0052322-0052330	Nov. 2, 2018 Email from Chase Robinson to T. Harvey regarding policies implemented in Canal	*
093	CANAL_0052724-0052764	From Binder Compilation, American Express Usage	802, 901

094*	CANAL_0025442-0025443	March 9, 2018 Email exchange involving Chase Robinson, Juanita Contreras, M. Billington and G. Spear	*
095	ROBINSON00006770-00006788	From Binder Compilation, Ubers/Taxi Usage	802, 901
096	CANAL_0052903-0052904	March 2018 Email exchanges involving Juanita Contreras, M. Billington and G. Spear	802, 901
097*	CANAL_0009464-0009468	March 2018 Email exchanges between Chase Robinson and Mark Despres	*
98	INTENTIONALLY OMITTED		INTENTIONALLY OMITTED
99	INTENTIONALLY OMITTED		INTENTIONALLY OMITTED
100	CANAL_0046110-0046111	January 16, 2019 email exchanges among Chase Robinson, M. Kaplan and R. De Niro	802
101*	ROBINSON00000119-00000120	January 16, 2019 email exchanges among Chase Robinson and R. De Niro	*
102*	ROBINSON00000134-00000136	January 2019 email exchanges among Chase Robinson and R. De Niro	*
103*	ROBINSON00001810	Chase Robinson Timesheet for Jan. 14-20, 201[9]	*
104	CANAL_0027946-0027951	January 2019 email exchanges between Chase Robinson, Lulu White and Assistant to Josh Lieberman	802
105*	ROBINSON00001811-00001812	Chase Robinson Timesheet for Jan. 21-27, 2019	*
106*	CANAL_0008888	January 2019 email exchanges between Chase Robinson, Lulu White and Assistant to Josh Lieberman	*
107*	ROBINSON00001813	Chase Robinson Timesheet for Jan. 28-February 3,2019	*
108*	ROBINSON00004629	February 2019 email exchanges between Chase Robinson and Amelie de Richemont regarding London trip	*
109*	ROBINSON00004630-00004631	February 2019 email exchanges between Chase Robinson and Amelie de Richemont regarding London trip	*
110	CANAL_0009517-0009518	February 9, 2019 Flowers Purchase Confirmation	802, 402
111*	ROBINSON00008519-00008523	Feb. 14, 2018-March 5, 2018, email exchange between Michael Tasch and Chase Robinson re American Express account	*
112	CANAL_0047058	Feb. 10, 2019, email exchange between Robert De Niro and Tiffany Chen re Chase's birthday	802
113*	CANAL_0036162-0036163	Feb. 5, 2019, Feb. 12, 2019, email exchange between Sally Lipsius and Chase Robinson re ADR session. Chase Robinson adds De Niro's assistants (Gillian Spear and Sarbina Weeks-Brittan) to email.	*
114	CANAL_0044218	Feb. 10, 2019, email from Robert De Niro to Chase Robinson wishing her a happy birthday. On Feb. 12, 2019, Chase forwards email to Michael Kaplan.	402

115	CANAL_0046217	Feb. 12, 2019, email from Chase Robinson to Robert De Niro re Vantage Point Benefits and Chase saying Berdon did not have De Niro's "best interest at heart."	402
116*	ROBINSON00001814	Timesheets for Feb 4 - Feb 10 2019	*
117	CANAL_0024482	Feb. 11, 2019 -Feb. 14, 2019, email exchange between Gillian Spear and Chase Robinson re Spear not receiving her overtime pay	402
118*	ROBINSON00022518-00022520	Dec. 16, 2018 - Feb. 16, 2019, email exchanges between Chase Robinson and Chris Young	*
119*	CANAL_0046248-0046249	Feb. 18, 2019, email exchange between Tiffany Chen and Chase Robinson re Elliot's Closets	*
120	CANAL_0000386-0000387	Netflix sign in	802, 402
121*	ROBINSON00001797	Chase Robinson Timesheet for October 29-November 4, 2018	*
122*	CANAL_0027682	November 7, 2018 email exchange among M. Tasch, Chase Robinson and Lulu White	*
123*	ROBINSON00008526	March 12, 2018, email exchange between Chase Robinson and Robert De Niro re Chase's flight	*
124	CANAL_0034027-0034030	Nov. 4, 2018 -Nov. 8, 2018, email exchange between Chase Robinson and Sabrina Weeks-Brittan (cc'd Gillian Spear, Michael Kaplan, amd Lulu White) re Holiday Season 2018	402
125	CANAL_0026716-0026719	Nov. 4, 2018 -Nov. 9, 2018, email exchange between Chase Robinson, Sabrina Weeks-Brittan, and Gillian Spear re Holiday Season 2019 and Gillian taking vacation/personal day	402
126	CANAL_0051747-0051763	Nov. 9, 2018 email exchanges between H. Feder and Chase Robinson	802
127*	CANAL_0052286-0052306	Nov. 9, 2018, email between Chase Robinson and Hagit Feder re Client Policies	*
128	CANAL_0052307-0052316	Nov. 2018 email exchange between Chase Robinson and M. Tasch regarding payment of counsel's invoice	402
129	ROBINSON00004506	Nov. 11, 2018 email from Chase Robinson to Chase Robinson	402
130	CANAL_0006935-0006939	Nov. 2018 email exchange between Chase Robinson and Joyce Hsieh	402
131*	CANAL_0051764-0051765	Nov. 12, 2018, email between Hagit Feder and Chase Robinson re policies	*
132*	CANAL_0052319-0052341	Nov. 12, 2018, email between Chase Robinson and Tom Harvey re policies	*
133*	ROBINSON00001798	Chase Robinson Timesheet for November 5-11, 2018	*
134	CANAL_0034038-0034041	November 2018 email exchanges between M. Kaplan and Chase Robinson	402
135*	ROBINSON00008606	Nov. 14, 2018 email from Chase Robinson to R. De Niro	*
136*	ROBINSON00008608	Nov. 14, 2018 email exchanges between Chase Robinson to R. De Niro	*
137	CANAL_0000415-0000416	Nov. 16, 2018 Netflix Sign-in	802

138*	ROBINSON00008609-00008610	Nov. 16, 2018 email exchanges between Chase Robinson to R. De Niro	*
139	CANAL_0000417-0000418	Nov. 17, 2018 Netflix Sign-in	802
140	CANAL_0035376-0035378	Nov. 19, 2018, email from Michael Kaplan to Chase Robinson (cc'd Lulu White and Rachel Humphreys) re 1117 Schedule/Reminders 11.20.18	802
141	CANAL_0006940-0006946	Nov. 20, 2019, email from Chase Robinson to Romeo-Joyce Hsieh (cc'd Emma Tillinger Koskoff) re Joker-Invoices with attachments of Canal W-9 and invoices	402
142*	ROBINSON00001799-00001800	Chase Robinson Timesheet for November 12-18, 2018	*
143	ROBINSON00022505-22507	November 22, 2018 email exchange between Chase Robinson and Chris Young	802
144*	ROBINSON00022508-00022509	November 24, 2018 email exchange between Chase Robinson and Chris Young	*
145*	ROBINSON00001801	Chase Robinson Timesheet for November 19-25, 2018	*
146*	ROBINSON00004580	Dec. 2, 2018 email from Chase Robinson to Chase Robinson	*
147*	ROBINSON00001802	Chase Robinson Timesheet for November 26-Dec. 2, 2018	*
148	CANAL_0022481	Dec. 5, 2018, email from Chase Robinson to Gillian Spear and Sabrina Weeks-Brittan (cc'd Lulu White) re Holiday Frames	402
149	CANAL_0034192	Dec. 2018 email exchanges between David Earls and Chase Robinson	402
150	ROBINSON00008616-00008618	Dec. 5, 2018 email and photo from Chase Robinson to R. De Niro	403 (reference to Trump)
151	ROBINSON00008619	Dec. 5, 2018 email from R. De Niro to Chase Robinson	403 (reference to Trump)
152*	ROBINSON00008621	Dec. 7, 2018 email from Chase Robinson to R. De Niro	*
153*	CANAL_0046028	Dec. 2018 email exchanges between R. De Niro and Chase Robinson	*
154*	ROBINSON00004581-00004584	Dec. 10, 2018 forwarded email between Chase Robinson and robinchambers100@gmail.com re Meeting; Emails with Dec. 10, 2018 with R. De Niro and Chase Robinson	*
155*	ROBINSON00001803	Chase Robinson Timesheet for Dec. 3-9, 2018	*
156	CANAL_0022492	Dec. 13, 2018 email from Chase Robinson to Chase Robinson	402
157	CANAL_0036372	Dec. 13, 2018 email exchange with Chase Robinson, Peter Hess and S. Weeks-Brittan	402
158	ROBINSON00004588	Dec. 15, 2018 email from Chase Robinson to Chase Robinson	402
159*	ROBINSON00004589-00004590	Dec. 16, 2018 email from Chase Robinson to Chase Robinson	*
160*	ROBINSON00008622	Dec. 16, 2018 email from Chase Robinson to R. De Niro	*
161	ROBINSON00022510	Dec. 16, 2018 email exchange between from Chase Robinson and Chris Young	802

162*	ROBINSON00001804	Chase Robinson Timesheet for Dec. 10-16, 2018	*
163	ROBINSON00004592	Dec. 18, 2018 email from Chase Robinson to R. De Niro	403 (redact Trump portion)
164*	ROBINSON00008623-00008626	Dec. 19, 2018 email exchanges between and among R. De Niro, Chase Robinson and M. Tasch	*
165	CANAL_0022529	Dec. 20, 2018 email exchange involving R. De Niro, Chase Robinson and M. Kaplan	402
166	ROBINSON00004593-00004594	Dec. 20, 2018 email from Chase Robinson to R. De Niro	403 (redact Trump portion)
167	ROBINSON00004596-00004597	Dec. 22, 2018 email from Chase Robinson to R. De Niro	403 (redact Trump portion)
168	CANAL_0046029-0046030	Dec. 23, 2018 email from Chase Robinson to R. De Niro	403 (redact Trump portion)
169	ROBINSON00004603-00004604	Dec. 23, 2018 email from Chase Robinson to M. Kaplan	402
170*	ROBINSON00001805	Chase Robinson Timesheet for Dec. 17-23, 2018	*
171*	ROBINSON00008631	Dec. 24, 2018 email from Chase Robinson to R. De Niro	*
172	CANAL_0000438-0000439	Netflix sign in from Hawaii	802
173	CANAL_0046031-0046032	Dec. 28, 2018 email from Chase Robinson to R. De Niro	403 (redact Trump reference)
174*	ROBINSON00001806-1807	Chase Robinson Timesheet for Dec. 24-30, 2018	*
175	CANAL_0044487	January 1, 2019 email exchange between M. Kaplan and R. De Niro	802
176*	ROBINSON00008611	Nov. 27, 2018 email exchange between Chase Robinson and M. Tasch	*
177*	ROBINSON00004613	Jan. 3, 2019 email from Chase Robinson to Chase Robinson	*
178*	CANAL_0003331-0003333	Email thread between Michael Tasch and Chase Robinson re American Express	*
179	ROBINSON00022511	Jan. 4, 2019 email between Chase Robinson and Chris Young	402, 802
180	CANAL_0044493	Jan. 5, 2019 email from M. Kaplan to Chase Robinson	802
181*	CANAL_0044179	Jan. 6, 2019 email from Chase Robinson to M. Kaplan	*
182*	CANAL_0046043	January 7, 2019 email exchanges between Chaes Robinson and R. De Niro	*
183*	CANAL_0046044	January 7, 2019 email exchanges between Chaes Robinson and R. De Niro	*
184*	ROBINSON00000025	January 7, 2019 email exchanges between Chaes Robinson and R. De Niro	*
185*	ROBINSON00001808	Chase Robinson Timesheet for Dec. 31-Jan. 6, 2019	*
186*	CANAL_0022612	Jan. 5-11, 2019, email exchange between Chase Robinson and Michael Tasch re Canal Productions - Special Petty Cash and American Express	*

187*	CANAL_0034220-0034221	Jan. 10-11, 2019, email exchange between Tiffany Chen and Chase Robinson (cc'd Robert De Niro) re Flight to Antigua and no catering on flight	*
188*	ROBINSON00000035	Jan. 11, 2019 email exchanges between Chse Robinson and R. De Niro	*
189	ROBINSON00022513	Jan. 11, 2019 email between Chase Robinson and Chris Young	402, 802
190*	ROBINSON00000098-00000099	Jan. 14, 2019 email exchanges between Chase Robinson and R. De Niro	*
191*	ROBINSON00001809	Chase Robinson Timesheet for Jan. 7-Jan. 13, 2019	*
192	ROBINSON00022515	Jan. 15, 2019 email between Chase Robinson and Chris Young	402, 802
193*	ROBINSON00001815	Chase Robinson Timesheet for Feb. 11-17, 2019	*
194*	CANAL_0044225-0044227	Feb. 20, 2019 email exchange among T. Chen, Chase Robinson and R. De Niro, as forwarded to M. Kaplan	*
195	ROBINSON00008943-8945, ROBINSON00008964-00008967	March 4, 2018, text messages between Juanita Contreras and Chase Robinson re placing books on plane and getting together. March 9, 2018, text messages between ameliabrain@gmail.com and Chase Robinson re reservation at Nobu. March 6-7, 2018, text messages from Robert De Niro. March 10-12, 2018, text message between Ameila Brain and Chase Robinson re Ameila thanking Chase for dinner, hotel, picking up books. March 1-4, 2018, text message from Chase Robinson to Amelia Brain re Chase taking Amelia out to lunch or dinner for her birthday.	802
196*	CANAL_0046334	Feb. 21, 2019 email from Chase Robinson to R. De Niro	*
197*	ROBINSON00000587	Feb. 23, 2019 email exchange between Chase Robinson and R. De Niro	*
198*	ROBINSON00004642-00004643	Feb. 24, 2019 email from Chase Robinson to Andrea Robinson	*
199	CANAL_0046366-0046369	Feb. 26, 2019 email exchange between Chase Robinson, Raphael De Niro and R. De Niro	402, 802
200*	ROBINSON00001816	Chase Robinson Timesheet for Feb. 18-24, 2019	*
201*	CANAL_0046374-0046375	Feb. 28, 2019 email exchange among T. Chen, R. De Niro and Chase Robinson	*
202*	CANAL_0047080	March 1, 2019 email exchange between Chase Robinson and R. De Niro	*
203*	CANAL_0002469-0002471	March 4, 2019 email exchange between Chase Robinson and Giselle Constante at Nobu	*

204*	ROBINSON00001817	Chase Robinson Timesheet for Feb. 25-March 3, 2019	*
205*	ROBINSON00004748-00004751	March 1, 2019 email exchanges among T. Chen, Chase Robinson and R. De Niro	*
206*	ROBINSON00008635-00008637	Jan. 4, 2019 email exchange between M. Tasch and Chase Robinson	*
207*	ROBINSON00010394	March 9, 2018 , email from Chase Robinson to Robert De Niro re Chase's flight to LA	*
208*	ROBINSON00001818	Chase Robinson Timesheet for Mar. 4-10, 2019	*
209*	CANAL_0035466	Mar. 12, 2019 email exchanges between M. Kaplan and Chase Robinson	*
210	CANAL_0046513	Mar. 18, 2019 email exchange between R. De Niro and Chase Robinson	402
211*	CANAL_0047099	Mar. 20, 2019 email exchange between R. De Niro and Chase Robinson regarding flights	*
212*	ROBINSON00001819	Chase Robinson Timesheet for Mar. 11-17, 2019	*
213	CANAL_0024475-0024476	Mar. 22, 2019 email exchanges between Chase Robinson, S. Weeks-Brittan and G. Spear	402
214*	CANAL_0046519	Mar. 22, 2019 email from Chase Robinson to R. De Niro	*
215*	ROBINSON00001820	Chase Robinson Timesheet for Mar. 18-24, 2019	*
216	CANAL_0035478-0035480	Mar. 26, 2019 email exchanges between M. Kaplan, T. Chen and R. De Niro	802
217	ROBINSON00022528-00022531	Mar. 26, 2019 email exchanges between Chase Robinson and Chris Young	402, 802
218*	CANAL_0009191-0009193	Mar. 27, 2019 email from T. Chen to Chase Robinson, copying M. Kaplan and R. De Niro	*
219	CANAL_0045262-0045265	Oct. 31, 2016, email exchange between Michael Kaplan and Chase Robinson re Kaplan's reservation for Walt Disney World Resort	802
220*	ROBINSON00010738-00010739	(2) Receipts from Paolas Restaurant	*
221	CANAL_0046641-0046642	Mar. 27, 2019 email exchanges among T. Chen, R. De Niro and Chase Robinson	
222*	ROBINSON00001347-00001349	Email correspondence dated March 27, 2019, between Chase Robinson and Bob re Painting Removal for 3/27 Paint Job	*
223	ROBINSON00004789-00004791	Mar. 27, 2019 email exchange between Chase Robinson and Andrea Robinson	802 402
224	ROBINSON00004798-00004802	Mar. 27, 2019 email exchanges between Chase Robinson and Andrea Robinson	402, 802
225	ROBINSON00004821-00004827	Mar. 28, 2019 email exchanges between Chase Robinson and Andrea Robinson	402, 802
226	ROBINSON00004831-00004833	Mar. 29, 2019 email exchanges between Chase Robinson and Andrea Robinson	402, 802
227	ROBINSON00022532-00022537	Dec. 16, 2018-March 31, 2019, email exchange between Chase Robinson and Chris Young re Young thanking Chase re "memorable dinner at Nobu Mayfair", Trump script, etc.	402
228*	CANAL_0036244-0036247	April 1, 2019 email exchanges between Lulu White, Chase Robinson, S. Weeks-Brittan and Dina Wise Shapiro	*

229*	ROBINSON00001821-00001822	Chase Robinson Timesheet for Mar. 25-31, 2019	*
230	CANAL_0034638-0034639	April 2, 2019 email exchange between G. Spear and M. Kaplan	402
231*	CANAL_0046682-0046683	April 2, 2019 email exchanges between R. De Niro and Chase Robinson	*
232*	CANAL_0046677-0046678	April 2, 2019 email exchnages between T. Chen and R. De Niro	*
233	CANAL_0028506-0028507	April 3, 2019 email exchanges between Chase Robinson, Lulu White and Romana Guillote	402
234*	ROBINSON00001602	April 4, 2019 email from Chase Robinson to R. De Niro	*
235*	CANAL_0044544	Mar. 27, 2019 email exchanges between T. Chen and Chase Robinson regarding paintings	*
236	CANAL_0046698-0046699	April 5, 2019 email exchanges between M. Tasch, M. Boswick, R. De Niro and T. Chen	802
237*	CANAL_0036475-0036477	April 6, 2019 email from T. Chen to Lulu White, G. Spear, S. Weeks-Brittan and R. De Niro	*
238*	CANAL_0049988-0049989	Apr. 6, 2019 email exchanges between Chase Robinson and R. De Niro (with T. Harvey, M. Boswick, M. Tasch and J. Hackett copied)	*
239*	ROBINSON00001822	Chase Robinson Timesheet for April 1-7, 2019	*
240	ROBINSON00022538-00022559	Dec. 16, 2018-April 6, 2019, email exchange between Chase Robinson and Christopher Young re Skye residency	802, 402
241	CANAL_0029539-0029540	Dec. 16, 2016-Dec. 18, 2016, email exchange between Chase Robinson and Julia Shelzi (cc'd Katherine Wernet and Morgan Billington) re Letter to Mr. DeNiro	402
242	CANAL_0025173	Apr. 4, 2019 email from G. Spear to G. Spear	802
243*	ROBINSON00011188-00011189	Feb. 16, 2018-Feb. 21, 2018, email exchange between Chase Robinson and Morgan Billington, Gillian Spear (cc'd Amelia Brain and Michael Kaplan) re Taxi Driver Books	*
244*	ROBINSON00004874	Apr. 10, 2019 email from Chase Robinson to Tom Harvey	*
245*	CANAL_0047370-0047373	Mar. 15, 2019 text exchanges between Chase Robinson and Lulu White	*
246	CANAL_0047472-0047478	April 9, 2019 text exchanges between M. Kaplan, S. Weeks-Brittan and G. Spear	802, 402
247	CANAL_0047503-0047510	April 2, 2019 text exchanges between M. Kaplan and T. Chen	802
248	CANAL_0047718-0047719	Jan. 25, 2019 text exchanges between M. Kaplan and Chase Robinson	402
249*	CANAL_0048085-0048087	Nov. 25, 2018 text exchanges between Chase Robinson and S. Weeks-Brittan	*
250	CANAL_0048141-0048142	Feb. 1, 2019 text exchanges between Chase Robinson, G. Spear and S. Weeks-Brittan	402
251*	CANAL_0048175-0048177	Feb. 23, 2019 text exchanges between Chase Robinson, G. Spear and S. Weeks-Brittan	*

252*	CANAL_0048323-0048325	Dec. 31, 2018 text exchanges between Chase Robinson and R. De Niro	*
253*	CANAL_0048373-0048374	Dec. 27, 2018 text from Chase Robinson to R. De Niro	*
254*	CANAL_0048460-0048461	Dec. 25, 2018 text from Chase Robinson to R. De Niro	*
255*	CANAL_0048687-0048692	Dec. 6, 2018 text exchanges between T. Chen and R. De Niro	*
256	CANAL_0048753-0048754	January 19, 2019 text exchanges between T. Chen and R. De Niro	802
257*	ROBINSON00011196	Mar. 22, 2019 email exchanges among Chase Robinson, G. Spear, R. De Niro and S. Weeks-Brittan	*
258	CANAL_0036557-0036559	February 5, 2018 message from R. De Niro to Chase Robinson	402
259	CANAL_0030382-0030384	Nov. 26, 2016 email from Chase Robinson to M. Kaplan	901, 802, 402
260*	CANAL_0020441	Dec. 4, 2017 email from Chase Robinson to M. Kaplan	*
261	CANAL_0013087	Mar. 14, 2015 email from Chase Robinson to M. Kaplan	402
262*	CANAL_0020878-0020882	Mar. 16, 2018 email exchanges between Chase Robinson and Office of Joe Peschi	*
263	CANAL_0019022	June 27, 2017 email from Chase Robinson to R. De Niro	402
264	CANAL_0036460	Mar. 22, 2019 email between G. Spear, S. Weeks-Brittan, R. De Niro and Chase Robinson	402, 802
265	CANAL_0025038-0025039	Email exchanges between Chase Robinson and Fiona Lennon	402
266	ROBINSON00002100-00002101	July 31, 2015, email from Chase Robinson to herself re Financial & Office Protocols	402
267	ROBINSON00005070-00005086	Email thread between Chase Robinson and Chris Young	402
268	ROBINSON00005108-00005109	Email thread between Chase Robinson and Aga McDaniel re LA	402
269*	ROBINSON00005304	Aug. 5, 2019, email from Chase Robinson to herself re Was given authorization to transfer points	*
270*	ROBINSON00006032-00006041	Text messages	*
271	ROBINSON00006115	Text message dated 11/30/2018 between Don Robinson and Chase Robinson	802
272*	ROBINSON00006226	Text message dated 4/1/2019 between Chase Robinson and Bryan Zak	*
273*	ROBINSON00006368-00006369	Text messages between Chase Robinson and Thomas Harvey	*
274	ROBINSON00006526	Text message dated 6/6/2019 between Chase Robinson and Bryan Zak	402, 403
275	ROBINSON00006588-00006604	Sept. 6, 2019, text messages between Chase Robinson and Andrea Robinson	402
276	ROBINSON00006608-00006616	Dec. 6, 2019, text messages between Bryan Zak and Chase Robinson	402, 802
277	ROBINSON00006704-00006711	Aug. 27, 2019, text messages between Chase Robinson and Bryan Zak	402
278*	ROBINSON00014866	Text message dated 1/12/2019	*
279*	ROBINSON00007158	Audio, 3/8/2019	*

280*	DEFENDANTS' EXHIBIT 288 Audio Recording Bates Stamped No. <u>ROBINSON00007186</u>	Audio, 3/8/2019	*
281	ROBINSON00007161	Audio, 3/8/2019	Reserve right to object based on what portion to be entered
282	ROBINSON00007168	Audio, 3/11/2019	Reserve right to object based on what portion to be entered
283	ROBINSON00007174	Audio, 3/27/2019	
284	ROBINSON00007175	Audio, 3/28/2019	Reserve right to object based on what portion to be entered
285	ROBINSON00007178	Audio, 4/2/2019 We only need to play 11:06-12:23	Reserve right to object based on what portion to be entered
286	ROBINSON00007180	Audio, 4/2/2019	Reserve right to object based on what portion to be entered
287	ROBINSON00007185	Audio, 4/4/2019	Reserve right to object based on what portion to be entered
288*	ROBINSON00007186	Audio, 4/4/2019	*
289	ROBINSON00007187	Audio, 4/5/2019	Reserve right to object based on what portion to be entered
290	ROBINSON00007194	Audio, 4/8/2019	Reserve right to object based on what portion to be entered
291	ROBINSON00007195	Audio, 4/8/2019	Reserve right to object based on what portion to be entered
292	ROBINSON00007196	Audio, 4/9/2019	Reserve right to object based on what portion to be entered
293	ROBINSON00007198	Audio, 4/9/2019	Reserve right to object based on what portion to be entered
294	ROBINSON00007199	Audio, 4/9/2019	Reserve right to object based on what portion to be entered
295	ROBINSON00007209	Audio, 5/29/2019	Reserve right to object based on what portion to be entered
296	ROBINSON00007211	Audio, 6/1/2019	Reserve right to object based on what portion to be entered
297	ROBINSON00007214	Audio, 6/6/2019	Reserve right to object based on what portion to be entered

298	ROBINSON00007225	Audio, 6/8/2019	Reserve right to object based on what portion to be entered
299	ROBINSON00007226	Audio, 6/9/2019	Reserve right to object based on what portion to be entered
300	ROBINSON00007228	Audio, 6/2019	Reserve right to object based on what portion to be entered
301	ROBINSON00007229	Audio, 6/9/2019	Reserve right to object based on what portion to be entered
302	Netflix_0001-0000001-0000521	Documents produced by Netflix in response to subpoena	402 – Advance Ruling Requested
303*	ROBINSON00012587	Jan. 22, 2018, email between Chase and Michael Tasch	*
304	ROBINSON00006970	Dec. 13, 2018, email exchange between Chase Robinson and Michael Tasch re American Express	Unable to identify, reserve right to object[1]
305	ROBINSON00007049-00007052	Email exchanges between T. Chen, R. De Niro and Chase Robinson, with forward to M. Tasch	Unable to identify, reserve right to object
306	ROBINSON00007053-00007054	Mar. 2 and 4, 2019, email exchanges between Chase Robinson J. Hackett and T. Harvey	Unable to identify, reserve right to object
307	ROBINSON00007068	Mar. 11, 2019, email from Chase Robinson to R. Chambers	Unable to identify, reserve right to object
308*	CANAL_0003324	Nov. 20, 2018-Nov. 27, 2018, email exchange between Michael Tasch and Chase Robinson re American Express	*
309*	CANAL_0020631	Jan. 19, 2018, email exchange between Chase Robinson and Michael Tasch re Chase not being able to transfer reward points to delta milage.	*
310	CANAL_0046702-0046704	April 4, 2019-April 6, 2019 , email exchange between Tiffany Chen and Michael Tasch (cc'd Bobby and Mark Boswick) re Amex bills for 117A E 65th	802
311	ROBINSON00005155-00005156	Robinson Personal Statement, enclosed in London School of Economics application	
312	ROBINSON00007147	Audio, 2/25/2019	
313	ROBINSON00007181	Audio, 4/3/2019	
314	ROBINSON00007189	Audio, 4/5/2019	
315	ROBINSON00007203	Audio, 5/3/2019	
316	ROBINSON00007206	Audio, 5/24/2019	
317	ROBINSON00007224	Audio, 6/8/2019	
318	ROBINSON00007230	Audio, 6/9/2019	
319	CANAL_0053307-0053320	Defendants' Inventory List of tangible and physical items Plaintiff returned during pendency of case, along with pictures of same. Email, dated December 24, 2021, from Plaintiff's counsel with Inventory List. <i>*Physical items may be brought to trial</i>	
319A	CANAL_0053319-0053320		
319B	CANAL_0053307-0053308		
319C	CANAL_0053309-0053318		

319D	CANAL_0053309-0053318		
320	CANAL_0047395-0047404	Text exchange from 6/6–6/7/2019 involving Michael Kaplan, Sabrina Weeks-Brittan, and Gillian Spear	
321	ECF #350-5	JW Marriott Confirmation Email, dated 03/09/2018, Re Reservation	
322	CANAL_0053298-0053305	Mar. 2018 email exchange between James and Chase Robinson re Le Marigot Santa Monica (Marroitt) with attachments	
323	CANAL_0048971–0048973	Apr. 7, 2019 Text Exchange between Gillian Spear, Kevin Rivas, Sabrina Weeks-Brittan, and Tiffany Chen	
324	ROBINSON00007188	Audio, 4/6/2019	
325	ROBINSON00011707		
326	ROBINSON00005114		
327	ROBINSON00002140-002143		
328	ROBINSON00002178		
329	ROBINSON00002769		
330	ROBINSON00005875		
331	ROBINSON00005881		
332	ROBINSON00006442		
333	CANAL_0023017-0023020		
334	CANAL_0046028		
335	ROBINSON00005388		
336	ROBINSON00005391		
337	ROBINSON00005890		
338	ROBINSON00006390		
339	ROBINSON00006531-00006542		
340	ROBINSON000014798		
341	ROBINSON00007177		
342	ROBINSON00007179		
343	ROBINSON00007216	Audio, June 7, 2019	
344	CANAL_0052891-0052901	PC Section from binder	